

**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

PLAINTIFF'S COUNTERSTATEMENTS

**TO DEFENDANT'S' LOCAL "RULE 56.1 STATEMENT OF UNDISPUTED FACTS",
ECF no. 280**

SEE SEPARATE VOLUME FOR SUPPORTING EXHIBITS

MAY IT PLEASE THE COURT, this document contains **PLAINTIFF'S**
COUNTERSTATEMENTS to **ECF no. 280**. This document supersedes and makes moot any
other document filed with respect to Defendant's "RULE 56.1 STATEMENT OF
UNDISPUTED FACTS". Kindly disregard **ECF doc. 278** in this regard.

The undersigned hereby attests under penalties of perjury that the above statements are
true and correct to the best of the undersigned's knowledge and memory on this eleventh
day of July (7/11), two thousand and twenty-one (2021). A certificate of service is provided
on the last page.



D. GEORGE SWEIGERT
Pro Se Non-Attorney
GENERAL DELIVERY
NEVADA CITY, CA 95959

DEFINITIONS

Anti-SLAPP	Anti - Strategic Lawsuit Against Public Participation
Aff't	Plaintiff's Affidavit or Declaration filed with this document
Exhibit A - X	Indicates an exhibit appears in the volume for A exhibits that accompany the PLAINTIFF'S AFFIDAVIT
Exhibit C - X	Indicates an exhibit appears in the volume for C exhibits that accompany the COUNTER STATEMENTS
Exhibit M - X	Indicates an exhibit appears in the volume that accompanies this MEMORANDUM OF LAW

I. Defense witness Corean Elizabeth Stoughton, Hanover, Maryland

100. Defendant made contact with a woman, determined to be living in Hanover, Maryland, named Corean Elizabeth Stoughton. She is a named witness.
101. Blog articles were written about Ms. Corean Elizabeth Stoughton on a blog known as SDNY.ORG [**Exhibit C-34**]
102. Defendant has reviewed articles on SDNY.ORG and attached PDF documents [**Exhibit C-35**].
103. In **ECF 134** 06/27/2019 filed in *Steele v. Goodman*, the Defendant makes a statement (under oath) that: [**Exhibit C-36**].
 - a. “On or about June 2019, Manuel Chavez, III voluntarily shared some of his personal e-mails with Defendant (Goodman). Among these were messages Chavez claims are communications from Thomas Schoenberger, an individual unknown to the Defendant who may in fact be highly placed in the organization of monetized conspiracy to harass and defame Defendant Goodman.
 - b. Additionally, Chavez provided communications between Plaintiff (Robert David Steele), Chavez, Steven Biss (attorney in *Steele v. Goodman*).
 - c. Chavez provided an email between Plaintiff (Robert David Steele) and Chavez in which Plaintiff (Steele) admits he is in direct contact with alleged co-conspirator Tyroan Simpson. [**Exhibit C-36**]
104. That the Defendant knew, or should be reasonably expected to have known, that Ms. Stoughton was the daughter of Ron Stoughton, as stated on the SDNY.ORG blog. [**Exhibit C-37, C-41**]
105. That the Defendant knew, or should be reasonably expected to have known, that the Manuel Chavez, III e-mail messages concerning Stephen S. Biss, Robert David Steele, Tanya Cornwell, Tyroan Simpson Ed Butowsky and Thomas Schoenberger had no inclusion of any references to the Plaintiff, nor included Plaintiff’s e-mail address. [**Exhibit C-38**].
106. The Defendant conducted a broadcast with Robert David Steele, George Webb Sweigert, and Trish Negron via YouTube livestream the day before the Port of Charleston “dirty bomb hoax” of June 14, 2017. [**Exhibit C-39**]
107. That Ms. Corean Elizabeth Stoughton (Meier) believed that Manuel Chavez, III, aka DEFANGO, was involved in a harassment campaign against her friend Kristina Julia. [**Exhibit C-40**]

108. That the Defendant knew, or should be reasonably expected to have known, that Ms. Stoughton (Meier) had copies of electronic communications from social media accounts provided to George Webb Sweigert [**Exhibit C-42, C-43**]
109. That the Defendant knew, or should be reasonably expected to have known, that the state police and Federal Bureau of Investigation (F.B.I.) received e-mail message cc: copies [**Exhibit C-44**].
110. That the Defendant knew, or should be reasonably expected to have known, that Ms. Stoughton (Meier) communicated with Donie O’Sullivan of C.N.N. concerning their piece of George Webb and Maatje Benassi. [**Exhibit C-45**].
111. That the Defendant knew, or should be reasonably expected to have known, that Ms. Stoughton (Meier) communicated with Maatje Benassi. [**Exhibit C-46**]
112. That the Defendant knew, or should be reasonably expected to have known, that Maatje Benassi’s husband is a U.S. Air Force civilian employee at the Pentagon. [**Exhibit C-47**]
113. That Defendant knew, or should have been reasonable expected to have known, that Matthew and Maatje Benassi have created a GoFundMe page. [**Exhibit C-47**]
114. That the Defendant has communicated with Donie O’Sullivan of C.N.N. News who created news stories about the Port of Charleston “dirty bomb hoax”. [**Exhibit C-48**]
115. That the Defendant has communicated with Donie O’Sullivan of C.N.N. News on several occasions. [**Exhibit C-49**]
116. On August 17, 2017, Defendant published a video podcast demonstrating his three-way telephone calling for George Webb Sweigert to Donie O’Sullivan at C.N.N. News. [**Exhibit C-50**]
117. Donie O’Sullivan, CNN, tweeted with the Defendant about the Matthew and Maatje Benassi story. [**Exhibit C-51**]
118. That Defendant knew, or should have been reasonable expected to have known, that Ron Stoughton is credited as one of four (4) men that created the Internet as society is aware of it presently.

II. Port of Charleston “dirty bomb hoax”

119. Defendant made a video podcast on May 27th, 2017, with George Webb Sweigert discusses the MEMPHIS MAERSK and Defendant discusses the film “CAPTAIN PHILLIPS”. [Exhibit C-1]
120. Defendant knew that George Webb Sweigert obtained some information from “DEEP URANIUM” (later in hindsight discovered to be Oakey Marshall Richards) related to the MEMPHIS MAERSK during a video podcast of “CLEAR AND PRESENT DANGER: CALM BEFORE THE STORM” broadcast live on June 14th, 2017. [Exhibit C-2]
121. Defendant texted via personal device on camera messages to Dr. Jerome Corsi, PhD to seek information about whether DEEP URANIUM’s information was credible on June 14th, 2017, in the video podcast “CLEAR AND PRESENT DANGER: CALM BEFORE THE STORM”. [Exhibit C-2]
122. Defendant made a telephone call during the live video podcast “CLEAR AND PRESENT DANGER: CALM BEFORE THE STORM” to the Coast Guard Charleston Sector office using the telephone number broadcast to the audience on June 14th, 2017. [Exhibit C-2]
123. Defendant maintained communications with “DEEP URANIUM” until March 2018 and during that time co-created approximately 25 video podcast shows featuring “DEEP URANIUM” in a new role as “THE HUDSON REPORT”. [Exhibit C-3]
124. Defendant stated in video entitled Sunday with Charles (Wednesday Hammer Drop Edition) Bonnie and Clyde, 12/06/2017, at time mark 2:32.00 “*As you know, as I have said, we have gotten over the past few months a lot of news from Mr. Hudson and the various members of the Hudson Group – that I am in touch with. While he is not broadcasting with us.*” [Exhibit C-4]
125. Defendant provided vessel location information, observed by Joe Napoli, of the MEMPHIS MAERSK to George Webb during the “CLEAR AND PRESENT DANGER: CALM BEFORE THE STORM” podcast at time-mark 1:52.56, where Mr. Goodman states, “Well, we’ve got a live map of the position of the Maersk Memphis right here, up on the screen.” [Exhibit C-21]
126. During the live podcast Mr. Goodman broadcast the telephone number to the Charleston Sector Office of the U.S. Coast Guard of **843-740-7050**, which Mr. Goodman called himself to speak with a person who answered the telephone at that number.

127. Defendant requested audience members (slightly over 2,000 viewers) to Twitter tweet **“DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS”** to the Twitter address for the 7th District U.S. Coast Guard headquarters.
128. During the “CLEAR AND PRESENT DANGER: CALM BEFORE THE STORM” podcast on 06/14/2017 Mr. Goodman displayed VESSELFINDER.COM on a large screen monitor to the audience (about 2,000 viewers) position locations for the MAERSK MEMPHIS at time-marker 1:33.15. [Exhibit C-21]
129. On 8/14/2017, on the Jason Goodman YouTube channel, a video podcast was distributed entitled “Hudson Revealed”. In the description of the video the following appears: *“While operating ion the background, Mr. Hudson has provided guidance and information assisting George and Jason daily for the past several months.”* [Exhibit C-5]

III. Possession of evidence

130. On 04/07/2018, ten weeks prior to docketing complaint, Defendant stated in a call-in show to Nathan Stolpmen (pg. 6, ECF 225)[Exhibit M-7], *“You better stop that Dave because all of the stuff has gone to the F.B.I.”* and *“I am working out a way to bring criminal prosecution against these people.”*
131. On 05/06/2018, six weeks prior to the docketing of the lawsuit, the Defendant releases the video *“The Trolls of Mount Shasta”*, viewed by over 10,000 people [Exhibit M-3]. Defendant makes following statements: *“You see I think David is engaged in a crime.”* and *“I have got the evidence of it.”*
132. Defendant Goodman created video podcast content with Quinn Michaels that featured Plaintiff’s declaration in Steele v. Goodman, dated 05/22/2018, docket 51, in a video entitled, *“Elvis Presley – The Devil in Disguise. The King, The Covenant and the #TimePhoneHack”*. [Exhibit C-4].
133. In an 07/11/2018 e-mail message to Colin Sullivan, Chief Counsel of Patreon, Inc. Defendant stated,
“I suspect he works for some sort of independent firm that is working hard to protect various criminals whose criminal activity (including charity fraud and crypto currency ponzi schemes) my journalistic endeavors continue to expose. I have extensive evidence to support these statements that I would be happy to share with you” and *“I am interested in speaking to you about how we might work together to put an end to Mr. Sweigert’s harassment. I believe it’s criminal, and now that he has threatened Patreon with a civil*

suit I wonder if you'd be interested in having a conversation about how we might strategize and cooperate to illuminate [sic] this mutual nuisance." [Exhibit C-23]

134. The Defendant advised the Chief Counsel for Patreon, a third-party credit card processor, by e-mail message on **12/08/2020** that he planned to file a New York anti-SLAPP motion in this lawsuit:

"I am writing to advise you that on November 10, 2020 Andrew Cuomo signed into law a new more powerful anti-SLAPP statute that I will be using to respond to Mr. Sweigert. This new statue has the power to stay all discovery in the matter and hopefully will get it dismissed entirely". [Exhibit C-24]

IV. E-mail messages from Manuel Chavez, III

135. **ECF 134**, SWORN STATEMENT OF DEFENDANT, 06/27/2019 *Steele v. Goodman* also contains EXHIBIT H, which is a direct message from Robert David Steele advising George Webb of Steele's intentions to sue Mr. Goodman with support from Manuel Chavez, III.

136. An article entitled *Right-Wing Activists Discussed Wiretapping Seth Rich's Family, Three People in the Room Say*. 02/18/2020, Daily Beast (<https://www.thedailybeast.com/right-wing-activists-discussed-wiretapping-seth-richs-family-three-people-in-the-room-say> stated:

- a. The group also included Thomas Schoenberger and Manuel "Defango" Chavez, two notorious internet provocateurs who had recently launched a self-proclaimed "elite" company that promised to use bots and sow "targeted chaos" to defend its clients online.
- b. While Butowsky describes their work as "reputation management," Shadowbox internal documents, obtained by The Daily Beast, describe its work more in more aggressive terms. "We address smear assaults head-on by custom-creating shadow 'bot' campaigns as a counter strategy," one pitch read. "We use targeted chaos to confuse your opponents."
- c. In its internal documents, the company describes itself as "your army" and promises to use "cyber-guerrilla tactics."
- d. "Where your enemies have lied to paint you as the bad guy, we sow the seeds of doubt and present the counter-narrative that they are, in fact, the villains, and you have been unjustly accused," the document reads. "We do this through sophisticated use of internet technology, meme creation, PR, and cyber-guerrilla tactics that stop the bleeding and begin to sway public opinion and the media in your favor.

137. The Defendant produced a video, displayed on the New Jersey Tea Party (alleged alt-right group) entitled, “Jason Goodman - Crowdsorce the Truth”, in September 2017 [Exhibit C-6] with the following video description:

“Jason Goodman, an independent journalist who operates Crowdsorce the Truth, has been exploring full time the incredible scandal that Washington and the Mainstream Media have been as quiet about as they can be: Imran Awan, the Pakistani given responsibility for the Democratic Party's computers and networks thanks to Debbie Wasserman-Schultz, and access to the confidential Blackberrys of some 50 Democratic Congressmen”

138. At time-mark 55:15 in the [Exhibit C-6] video, Defendant states:
 “There is a Pulitzer prize winning journalist named Sy Hersh.. [55:25] so a couple of weeks ago an audio recording – quite obviously secretly recorded ... [55:35] and Sy Hersh could be heard speaking about the Seth Rich murder ...[55:59] and furthermore the audio was released by a guy named Ed Butowsky...[56:15] apparently this is the guy that paid Rod Wheeler to do the investigation... “

V. **Money Laundering of Manuel Chavez, III**

139. Defendant published a video entitled, “*Has Quinn Michaels Discovered Evidence of A Manuel Chavez Steemit Money Laundering Scam?*” with the video description, “I’ve been investigating block chain driven, cryptocurrency backed [Steemit.com](https://steemit.com), since the misanthrope Frank Bacon began his hard sell over a year ago. Despite a market cap over \$400M, their NYC office is nothing more than a PO Box. Blockchain witness Blair indicated the verification method could be rigged by 1 individual. Tone Vays says the Steemit blockchain isn’t a true blockchain. Now Quinn has caught Manuel Chavez III (Defango) red handed in what appears to be a money laundering scheme. [Exhibit C-7]
140. Defendant published a video entitled, “*Is Manuel Chavez III Offering Instructions for a Money Laundering Scheme on Steemit.com? – PART 2*” with the video description, “Quinn discovered a Discord chat message from Manuel Chavez III (Defango) that seems to indicate Chavez suggesting a method to “make money out of thin air” & launder it through a complex system of cryptocurrencies, automated procedures & exchanges. If in fact he is doing this, where is the money coming from? Is someone being scammed? We just don’t know but now you can examine his own writings to try to figure it out.

Crowdsource the Truth on Patreon
www.patreon.com/crowdsourcethetruth”

141. Both of the videos listed above feature Maureen Shay Mensing (see ¶¶ 65-67, pg.33, ECF 88) of Madison, Wisconsin, aka “KENNEDY”. [Exhibit C-22]

VI. Video podcasts with Quin Michaels, aka Corey Atkins and KENNEDY, aka Maureen Shay Mensing

142. As explained on pg. 32, ECF 88, in a video “Published on May 30, 2019, My response to Jason Goodman of Crowdsourcing the Truth using me as leverage against Quinn Michaels in a live chat,” Ms. Mensing stated:

04:44 What’s wrong with Jason Goodman is that he became fixated on fighting with other YouTubers and using Quinn Michaels research and material to back it up to the point of stretching the logic. And, steering conversations continuously and **most notably to talk about Dave Acton**. [Plaintiff] [Exhibit M-19]

143. Defendant published a video entitled, “Only ON Patreon FREE Preview: My Friend Mr. Leakey, His Friend Q anon & the Mysterious Crypto Cypher”, in which he states, “And you have been talking about Q Anon using A.I. and all this technology” after Quinn Michaels states “We are getting into the Q Anon stuff”.

VII. Seth Rich Murder Investigation

144. Defendant publish a video entitled, “Judge Dismisses Seth Rich Family Civil Suit – Special Guest Retired Homicide Detective Rod Wheeler” with the video description “Rod Wheeler, retired DC MPD homicide detective was hired on behalf of the Rich family to investigate the unsolved murder of their son Seth, the purported DNC insider who may have leaked data to Wikileaks. Soon after Wheeler found himself on the opposite end of a civil suit filed against Fox News & himself by the Rich family. He joins me to discuss this bizarre odyssey.” At time-mark 2:03 Defendant states, “You met with me and George Webb very early, about a year and a half ago, something like this and we discussed the case.” <https://www.brighteon.com/5821522856001> [Exhibit C-10]

145. In the above listed video, “Judge Dismisses Seth Rich Family Civil Suit – Special Guest Retired Homicide Detective Rod Wheeler”, the Defendant begins discussing Edward Butowsky with Rod Wheeler. [Exhibit C-10]

VIII. Robert David Steele

146. On December 2, 2017 a message was sent to Jason Goodman by Steven S. Biss, esq. From: "Steven S. Biss" <stevenbiss@earthlink.net>

To: spoliation-notice@mailbox.org, Jason Goodman
<truth@crowdsourcethetruth.org>Cc: Robert Steele
<robert.david.steele.vivas@gmail.com>, Johan Conrod <rjconrod@kaufcan.com>,
"Terry C. Frank" tcfrank@kaufcan.com

Date: 12/02/2017 5:22 PM

Subject: Evidence Preservation Notice [Exhibit C-11]

147. **There is an attachment to the e-mail message listed above.**

From: **Spoliation Notice** <spoliation-notice@mailbox.org>

Date: Fri, Dec 1, 2017 at 11:58 AM

Subject: Evidence Preservation Notice

To: support@streateasy.com, truth@crowdsourcethetruth.org, Spoliation Notice
<spoliation-notice@mailbox.org>, demsker@demskerrealty.com

Cc: NDIRecords@dps.state.nv.us, jwright@dps.state.nv.us, cbsmith@dps.state.nv.us, msmartin@gov.nv.gov, gpowell@dps.state.nv.us, pio@lvmpd.com, contact@unrig.net, stac@clarkcountynv.gov, nyspmail@troopers.ny.gov [Exhibit C-12]

148. An e-mail message (Date: **08/26/2018** 12:01 AM) sent to the Plaintiff by Defendant (jason@21stcentury3d.com) stated: "I run a subscription based video service. **You are the one protecting charity fraud and RICO.** Each email you send increases your legal liability." [emphasis added] [Exhibit C-13]

149. In the **07/11/2018** e-mail message to Colin Sullivan, Chief Counsel of Patreon, Inc. Defendant stated,
"I suspect he [Plaintiff] works for some sort of independent firm that is working hard to protect various criminals whose criminal activity (including charity fraud and crypto currency ponzi schemes) my journalistic endeavors continue to expose. I have extensive evidence to support these statements that I would be happy to share with you" and "I am interested in speaking to you about how we might work together to put an end to Mr. Sweigert's harassment. I believe it's criminal, and now that he has threatened Patreon with a civil suit I wonder if you'd be interested in having a conversation about how we might strategize and cooperate to illuminate [sic] this mutual nuisance." [emphasis added][Exhibit 23]

IX. **BitChute CRAZY DAVE channel**

150. **The above referenced e-mail (Date: 08/26/2018 12:01 AM) contains the following statement:**

>> You have persistently harassed me, and in this case, business associates of mine that are totally unrelated to bitchute.com or activity on bitchute.com by me or anyone else. **Furthermore, you have presented no evidence whatsoever that I or anyone affiliated with me is responsible for uploading the video files you have referred to on**

bitchute.com. You could have easily done this yourself as a pre-text or further motivation to send harassing anonymous emails and threats.

>>

>> You yourself created the videos in question, and the CRAZY_DAVE bitchute account you refer to **shows no clear connection to me or my business endeavors.** It is not monetized in any way that I observe and does not reference my business in a promotional manner or advertise my endeavors in any way. Bringing it to the attention of business associates of mine along with your baseless allegations and threats of legal action against myself and my associates is clearly a malicious act of tortious interference on your part and represents significant legal exposure for you.

>>

>> To clarify further, it remains unclear if the bitchute channel in question violates copyright law in the way you allege. It may in fact be protected by “fair use” under the Digital Millennium Copyright Act, but that in and of itself would be up to the determination of a judge. **I have heard on the internet that this particular bitchute channel is intended to be an evidence repository. The video content on it would appear to demonstrate your own criminal intent to harass and intimidate myself and others as you have for the past 12+ months and continue to in an ongoing fashion.** [emphasis added]

151. As documented in **ECF doc. 18-1**, filed 8/28/2018, [**Exhibit C-17**] the Defendant created an account on BITCHUTE.COM known as the CRAZY_DAVE channel. The JASON GOODMAN account expresses in the chat session “Check bit chute for CRAZY_DAVE” and “That bit chute channel is an evidence repository of Dave’s archived videos” and “Dude, hoax wars is another one I want in jail” and “they all work for Dave” and “Dave did not create the crazy Dave bitchute it’s an evidence repository”.
152. As shown in **Exhibit C-18**, a video on the CRAZY_DAVE BitChute channel.
153. In **ECF doc. 274, 05/17/2021**, DEFENDANT’S RESPONSE TO INTERROGATORIES, the Defendant stated on page 5:

1) c. For the period from June 14, 2015 to the present, identify each Uniform Resource Locator (URL) Internet address used by Defendant to post Plaintiff’s name and/or picture.

RESPONSE

Defendant has a channel on Bitchute called Crazy_Dave (<https://www.bitchute.com/channel/z2Uf9iOV7Qym/>). This channel is used as an evidence repository to store videos made by the Plaintiff and deleted by the Plaintiff. As

described in these pleadings previously, in the videos Plaintiff makes public declarations against his own interest, detailing his own family's history of mental illness, his vengeful, malicious plans to destroy his nephew's medical career, expose details about the childhood sexual abuse of his brother and other reprehensible things, incriminating himself and rendering himself defamation proof with regard to public statements from third parties including Defendant. Defendant reminds the court that Plaintiff took the extrajudicial step of compelling **Bitchute to remove the evidence from Defendant's channel so it cannot be accessed**. Defendant retains a copy of the video in his personal files and has produced it to Plaintiff along with other relevant videos. [emphasis added]

154. In an e-mail message on May 14, 2018 at 3:34 PM from Jason Goodman <jason@21stcentury3d.com> wrote: [**Exhibit C-14**]
The anonymous individual claiming to bring this action has been engaged in a cyber harassment campaign against me for more than 9 months. He is a menace and possibly **mentally ill**. He is engaged in the regular practice of submitting false claims to law enforcement and other authorities. Just last we he publicly disseminated my personal phone number in his ongoing efforts to harass me. His anonymous messages are obviously not official notification from a lawyer and as such, should be disregarded. [emphasis added]
155. In an e-mail message on Date: 06/30/2018 at 1:15 AM from Jason Goodman truth@crowdsourcethetruth.org wrote: [**Exhibit C-15**]
In addition to suffering from what appears to be obvious mental illness, he is a sexual deviant, publicly admitting to wife swapping with his own brother George Webb Sweigert, also copied on this message.
156. In an e-mail message on Date: 06/30/2018 at 4:16 PM from Jason Goodman truth@crowdsourcethetruth.org wrote [**Exhibit C-16**]
Hire a process server Dave. While you are doing that, you should know I will do my very best to see you prosecuted for harassment, cyber bullying and whatever else the law will allow. You are a menace to the public, a danger to yourself and others, a disgrace to the military (if in fact you ever served, where is that DD214?) and very likely criminally insane. Your email below constitutes continued harassment. You have been instructed not to contact me or publicly speak about me. You have submitted false statements to the Federal Court.

X. Jerome Corsi, Robert David Steele, Larry Klayman

157. As shown in **Exhibit C-19** Dr. Jerome Corsi interviewed Robert David Steele in a video simu-podcast entitled, "*DR CORSI DEEP DIVE INTERVIEW 11-25-20 ROBERT DAVID STEELE - HOW THE 2020 ELECTION ENDS IN TRUMP VICT*". Published by Mr. Corsi and Mr. Steele on their respective BitChute channels.

158. As shown in **Exhibit C-20** Dr. Jerome Corsi interviewed Robert David Steele in a video simu-podcast entitled, “*DR CORSI SPECIAL BROADCAST ROBERT DAVID STEELE: TRUMP WINS-HOW THE 2020 ELECTION ENDS IN A TRUMP WIN*” Published by Mr. Corsi and Mr. Steele on their respective BitChute channels.
159. That Dr. Jerome Corsi, Phd and Larry Klayman, acting as co-plaintiffs, both sued Alex Jones of Infowars, in a federal defamation case, A-20-CV-298-LY, in the Western District of Texas. **[Exhibit C-25]**
160. In a report and recommendation of the magistrate judge in A-20-CV-298-LY it was stated both Corsi and Klayman were in danger of Fed. R. Civ. Proc. Rule 11 sanctions. **[Exhibit C-26]**
161. In said report and recommendation it states, “Plaintiff’s Amended Complaint describes Jerome Corsi as an “author and political commentator,” and Larry Klayman as a “public interest legal advocate” and “media personality and author, columnist and syndicated radio talk show host.” Dkt. No. 47 at ¶¶ 3-4.” **[Exhibit C-27]**
162. Larry Klayman convened a Citizen Grand Jury to indict President B. H. Obama in 2013 and threatened an indictment against two justices of the U.S. Supreme Court. **[Exhibit C-28]**
163. Larry Klayman filed a federal lawsuit and a complaint of misconduct against Robert S. Mueller, III on behalf of Dr. Jerome Corsi, PhD. See “*The Earth Shook after Grand Jury Indictment of Robert Mueller*” **[Exhibits C-29 and C-30]**
164. Larry Klayman styles himself as a SPECIAL PROSECUTOR **[Exhibit C-31]**
165. Defendant participated in several Citizen Grand Juries with both Klayman and Corsi related to the indictment of Robert S. Mueller, III **[Exhibit C-32]**
166. The Defendant and George Webb Sweigert met with Jerome Corsi **[Exhibit C-33]**

XI. George Webb and his brother

167. That the Defendant made public critiques regarding telephone calls between Sy Hersh and George Webb Sweigert.
168. Defendant posted Twitter tweets about George Webb and his brother. **[Exhibit C-52, C-53]**
169. The Defendant publish a tweet using these words:

Apr 27, 2020

Dave, did you delete the tweet where I reminded everyone of your public admission of a family history of schizophrenia & wife swapping with your own brother? These are your words, not mine. That is totally sick by the way...

170. Defendant has no evidence to support the claim of “wife swapping” or “family history of schizophrenia” or “these are your words”.
171. The Defendant published a video podcast on 11/19/2018, entitled, Counterlawfare Report with Brian Vukadinovich, Corrupt Prosecution Requires Eye for an Eye Law [**Exhibit C-56**]

XII. **David Charles Hawkins, Field McConnell, ABEL DANGER**

172. David Charles Hawkins has been a weekly co-host with Jason Goodman video podcasts. [**Exhibit C-54**]
173. David Charles Hawkins has written articles about Kristine Marcy, the sister of Field McConnell of Plum City, Wisconsin. [**Exhibit C-55, C-57**]
174. Defendant has visited Field McConnell’s home in Plum City, Wisconsin to create video podcasts with him. [**Exhibit C-57**]
175. David Charles Hawkins and Field McConnell discussed Kristine Marcy in 2010. [**Exhibit C-58**]
176. Defendant has stated that he felt a “falling out” with Field McConnell at Operation Classified in Dallas, Texas in November 2018.
177. At Operation Classified a video podcast was created referring to a “Patriot’s Roundtable” that featured interviews with Kevin Shipp, Sydney Powell, esq., former special agent Robyn Gritz, and Scott Allen Bennett.
178. When Defendant interviewed Sydney Powell, esq. on two occasions at Operation Classified in November 2018 Defendant understood that she was the personal attorney for Lt. General Michael Flynn, U.S.A, (ret.)
179. Defendant created video podcasts with Larry Klayman, esq. and Dr. Jerome Cosi, PhD known as the “Citizen Grand Jury” for the purposes of issuing an indictment against Robert S. Mueller, III.

180. Defendant visited the home of Dr. Jerome Corsi, PhD in New Jersey with George Webb Sweigert.
181. Defendant exchanged text messages with Dr. Jerome Corsi, PhD twenty (20) minutes before the Defendant's telephone call to the Coast Guard Sector office at the Port of Charleston.
182. Defendant discussed the motor vessel MEMPHIS MAERSK with George Webb Sweigert in a podcast video distributed May 27, 2017, that includes Defendant talking about "Captain Phillips".
183. Defendant discussed the motor vessel MEMPHIS MAERSK with George Webb Sweigert in a podcast video distributed May 27, 2017 and listened to Webb's request for the need of daily tracking of the MEMPHIS MAERSK.
184. Defendant paid for hotel accommodations while making video podcasts with Quinn Michaels in Las Vegas, Nevada.
185. Defendant discussed with the attending surgeon to Quinn Michaels what his opinion would be of a high energy beam that could cause a lung bleb rupture, in the doctor's words a "Star Wars beam".
186. In a video podcast with George Webb Sweigert physically present in the Defendant's apartment, and Quinn Michaels remotely, the group discussed the car of George Webb's brother in Mount Shasta, California.
187. The Defendant has had no formal training in journalism, investigative journalism, or public policy.
188. The Defendant's CrowdSource The Truth 2 and 3 channels on YouTube.com have been terminated for violations of "Community Standards".
189. No artifacts of evidence were ever provided to the Federal Bureau of Investigation about the Plaintiff in April or May 2018 by the Defendant.
190. Defendant received dozens of e-mail messages that were forwarded messages of originals from Manuel Chavez, III (Carson City, Nevada) between May and July 2019 which contained e-mail addresses Robert David Steele, Steven S. Biss, Tanya Biss, Frank Bacon aka Tyrone Simpson, and others.
191. In the e-mail messages described above, that Defendant received between May and June 2019, the Plaintiff's name or e-mail address was not included in such communications.

192. Defendant knew that the Plaintiff's name or email address did not appear in any of the forwarded messages sent to Defendant by Manuel Chavez, III.

The undersigned hereby attests under penalties of perjury that the above statements are true and correct to the best of the undersigned's knowledge and memory on this eleventh day of July (7/11), two thousand and twenty-one (2021). A certificate of service is provided on the last page.



D. GEORGE SWEIGERT
Pro Se Non-Attorney
GENERAL DELIVERY
NEVADA CITY, CA 95959

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been transmitted via electronic mail message to the following parties on the eleventh day of July (7/11), two thousand and twenty-one (2021).

Clerk of the Court, Room 200 temporary_pro_se_filing@nysd.uscourts.gov	Jason Goodman, CEO truth@crowdsourcethetruth.org
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D. GEORGE SWEIGERT
Pro Se Non-Attorney
GENERAL DELIVERY
NEVADA CITY, CA 95959